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Third-Party Claimants Unified Life Insurance Company
And Allied National, Inc.*

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

CHARLES M. BUTLER, III, and } Cause No.: CV 17-50-SPW-TJC
CHOLE BUTLER, }
Plaintiffs, }
vs. }
UNIFIED LIFE INSURANCE }
COMPANY; HEALTH PLANS }
INTERMEDIARIES HOLDINGS, }
LLC, D/B/A HEALTH INSURANCE }
INNOVATIONS; HEALTH }
INSURANCE INNOVATIONS, INC.; }
ALLIED NATIONAL, INC.; }
NATIONAL BROKERS OF }
AMERICA, INC.; THE NATIONAL }
CONGRESS OF EMPLOYERS, INC.; }
and DOES 1-10, }
Defendants. }
UNIFIED LIFE INSURANCE }
COMPANY AND ALLIED }
NATIONAL, INC., })
UNIFIED LIFE INSURANCE COMPANY'S UNOPPOSED MOTION FOR PARTIAL DEFAULT JUDGMENT NATIONAL BROKERS OF AMERICA

Crossclaimants and
Third- Party Claimants,
vs.

HEALTH PLANS INTERMEDIARIES
HOLDINGS, LLC, D/B/A HEALTH
INSURANCE INNOVATIONS;
HEALTH INSURANCE
INNOVATIONS, INC.

Crossclaim Defendant,

and

NATIONAL BROKERS OF
AMERICA, INC.,

Crossclaim Defendant,

and

MULTIPLAN, INC.

Third-Party Defendant.

COMES NOW Defendant/Crossclaimant Unified Life Insurance Company (“Unified”) and respectfully moves for entry of Partial Default Judgment against National Brokers of America, Inc. (“NBoA”). This Motion is supported by accompanying Memorandum of Law. Counsel for all parties who have appeared have been contacted and have consented to this request. A proposed partial default judgment is provided herewith.

DATED this 19th day of December, 2018.

By: /s/ Robert L. Sterup
Robert L. Sterup
BROWN LAW FIRM, P.C.
*Attorneys for Defendants,
Crossclaimants and Third-Party
Claimants Unified Life Insurance
Company and Allied National, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2018, a copy of the foregoing was electronically filed and served on the following persons by the following means:

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|------------|---------------|-------|--------------------|
| <u>1-4</u> | CM/ECF | _____ | Fax |
| ____ | Hand Delivery | _____ | E-Mail |
| ____ | Mail | _____ | Overnight Delivery |

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By: /s/ Robert L. Sterup
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